

**IN THE UNITED STATES DISTRICT COURT FOR THE  
WESTERN DISTRICT OF MISSOURI  
WESTERN DIVISION**

UNITED STATES OF AMERICA,

Plaintiff,

v.

(1) MICHAEL D. MOORE,  
[DOB: 12/11/1989]

(2) JAMAHL D. JONES,  
[DOB: 01/23/1987]

(3) KEONA L. JOHNSON,  
[DOB: 01/11/1994]

Defendant.

Case No. \_\_\_\_\_

**COUNT ONE, FOUR, and SEVEN**  
**MOORE AND JONES**

*Felon in Possession of a Firearm*

18 U.S.C. §§ 922(g)(1) and 924(a)(2)

NMT 10 years' imprisonment

NMT \$250,000 fine

NMT 3 years' supervised release

Class C felony

**COUNT TWO and FIVE**  
**JONES**

*Possession with Intent to Distribute a  
Controlled Substance, Marijuana*

21 U.S.C. §§ 841(a)(1), and (b)(1)(D)

NMT: 5 Years

NMT: \$250,000 Fine

NLT: 2 Years Supervised Release

Class D Felony

**COUNT THREE and SIX**  
**JONES**

*Possessing a Firearm in Relation to a Drug  
Trafficking Crime*

18 U.S.C. § 924(c)(1)(A)(i)

NLT: 5 Years Imprisonment (consecutive)

NMT: Life Imprisonment

NMT: \$250,000 Fine

NMT: 5 Years Supervised Release

Class A Felony

**COUNT EIGHT**  
**JOHNSON**

*Making a Misrepresentation in the Acquisition  
of a Firearm*

18 U.S.C. §§ 922(a)(6) and 924(a)(2)

NMT 5 Years Imprisonment

NMT \$250,000 Fine

NMT 2 Years Supervised Release

Class C Felony

\$100 Mandatory Special Assessment as to Each  
Count

## **INDICTMENT**

THE GRAND JURY CHARGES THAT:

### **COUNT ONE**

On or about August 17, 2020, in the Western District of Missouri, the defendant, MICHAEL D. MOORE, knowing he had previously been convicted of a crime punishable by imprisonment for a term excepting one year, knowingly possessed a firearm, to wit: a Smith and Wesson SD9 9mm pistol, bearing Serial Number FYK4174, and the firearm was in and affecting commerce, in violation of Title 18, United States Code, Sections 922(g)(1) and 924(a)(2)

### **COUNT TWO**

On or about July 29, 2020, in the Western District of Missouri, the defendant, JAMAHL D. JONES, did knowingly possess with intent to distribute marijuana, a Schedule I controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and (b)(1)(D).

### **COUNT THREE**

On or about July 29, 2020, in the Western District of Missouri, the defendant, JAMAHL D. JONES, in furtherance of the drug-trafficking crime alleged in Count Two, did knowingly possess a firearm, to wit: a MasterPiece Arms 9mm pistol, bearing Serial Number FX13875, in violations of Title 18, United States Code, Section 924(c)(1)(A)(i).

### **COUNT FOUR**

On or about July 29, 2020, in the Western District of Missouri, the defendants, JAMAHL D. JONES, knowing he had previously been convicted of a crime punishable by imprisonment for a term excepting one year, knowingly possessed a firearm, to wit: a MasterPiece Arms 9mm pistol, bearing Serial Number FX13875, and the firearm was in and affecting commerce. All in violation of Title 18, United States Code, Sections 922(g)(1) and 924(a)(2)

### **COUNT FIVE**

On or about August 17, 2020, in the Western District of Missouri, the defendant, JAMAHL D. JONES, did knowingly possess with intent to distribute marijuana, a Schedule I controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and (b)(1)(D).

### **COUNT SIX**

On or about August 17, 2020, in the Western District of Missouri, the defendant, JAMAHL D. JONES, in furtherance of the drug-trafficking crime alleged in Count Four, did knowingly possess a firearm, to wit: a Sadarius 9mm semi-automatic handgun, bearing Serial Number T110220BV58407, in violation of Title 18, United States Code, Section 924(c)(1)(A)(i).

### **COUNT SEVEN**

On or about August 17, 2020, in the Western District of Missouri, the defendants, JAMAHL D. JONES, knowing he had previously been convicted of a crime punishable by imprisonment for a term exceeding one year, knowingly possessed a firearm, to wit: a Sadarius 9mm semi-automatic handgun, bearing Serial Number T110220BV58407, and the firearm was in and affecting commerce. All in violation of Title 18, United States Code, Sections 922(g)(1) and 924(a)(2)

### **COUNT EIGHT**

On or about August 17, 2020, in the Western District of Missouri, the defendant, KEONA L. JOHNSON, in connection with the acquisition of a firearm to wit: a a Sadarius 9mm semi-automatic handgun, bearing Serial Number T110220BV58407, from Drum Magazine LLC, a federally licensed dealer of firearms, knowingly made a false and fictitious written statement to Drum Magazine LLC, as to a fact material to the lawfulness of such acquisition of the said firearm to the defendant under Chapter 44, Title 18, in that the defendant represented that she was the

actual transferee/buyer of the firearm, in violation of Title 18, United States Code, Sections 922(a)(6) and 924(a)(2).

A TRUE BILL.

/s/ Pamela Carter-Smith  
FOREPERSON OF THE GRAND JURY

/s/ Matthew Moeder  
Matthew Moeder  
Assistant United States Attorney

Dated: 9/9/2020  
Kansas City, Missouri